



Tulane Environmental Law Clinic

October 14, 2021

VIA FOIA ONLINE

U.S. Environmental Protection Agency

Re: Freedom of Information Act Request

Dear FOIA Officer:

On behalf of Patricia Charles, Carolyn Peters, Raphael Sias, Ronald Carrier, Larry Allison, Karl Prater, McKeever Edwards, Stafford Frank, and Peggy Anthony (collectively, “Mossville Residents”), and pursuant to the Freedom of Information Act, 5 U.S.C. §552, we hereby request the following documentation, in whatever form, electronic or otherwise:

All documentation in connection with the reduction in ethylene oxide emissions reported by Sasol Chemicals (USA) – Lake Charles Chemical Complex, Westlake, LA including but not limited to: a) documentation reflecting EPA review of Sasol’s reported reduction, including EPA review of any Louisiana Department of Environmental Quality evaluation of Sasol’s reported reduction; b) documentation detailing the calculation methods and/or performance testing used by Sasol Chemicals in its reported reduction in ethylene oxide emissions from 2014 to the present; c) EPA’s response to Sasol Chemicals’ March 17, 2020 comment submitted to EPA Docket Center (comment ID: EPA-HQ-OAR-2018-0746-0162) requesting that EPA’s MON risk modelling be updated to reflect Sasol’s revised 2014 ethylene oxide emissions for its Vapor Combustion Unit; d) any and all Sasol-related communication between EPA Region 6 and the Louisiana Department of Environmental Quality in connection with EPA’s October 15, 2020 request for information on facilities in Louisiana that have recorded reductions in ethylene oxide since 2014; and e) any and all documentation sent by Sasol Chemicals to EPA in May of 2021 related to the process changes that led to the reduction in ethylene oxide emissions.

The subject of this request concerns the operations and activities of the EPA, a governmental agency, and the information sought is likely to contribute to Mossville Residents’ understanding of these operations and activities. Further, this information is significant in terms of the public’s understanding of EPA’s processes because the information relates to EPA’s review of emissions reductions of a highly carcinogenic pollutant that will have longterm effects on the residents of Mossville. Mossville Residents have no commercial interest in the

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6329 Freret St., Ste. 130, New Orleans, LA 70118-6231 tel/ 504.865.5789 fax 504.862.8721 www.tulane.edu/~telc

information sought but, rather, seek to determine the method by which the emissions reductions of ethylene oxide were calculated by Sasol Chemicals and reviewed by the EPA.

Should you decide that any of the requested material is not to be disclosed, please describe the material withheld and specify in detail the statutory or administrative basis for withholding it. All segregable, non-exempt parts of documents should be provided.

Thank you.

Prepared by:

/s/Catherine Meyer
Catherine Meyer, Law Student
Tulane Environmental Law Clinic
6329 Freret Street
New Orleans, LA 70118
Telephone: (504) 865-5789
Fax: (504) 862-8721
Email: cmeyer7@tulane.edu

Respectfully submitted by:


Lisa W. Jordan
Lisa W. Jordan
Tulane Environmental Law Clinic
6329 Freret Street
New Orleans, LA 70118
Telephone: (504) 865-5789
Direct: (504) 314-2481
Fax: (504) 862-8721
Email: lwjordan@tulane.edu
Counsel for Mossville Residents